

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DENSO CORPORATION,

Plaintiff,

v.

SKYWORKS SOLUTIONS, INC.,
AND SKYWORKS FILTER
SOLUTIONS JAPAN CO. LTD,

Defendants.

CASE NO. 8:25-cv-01329-FWS

**SKYWORKS SOLUTIONS, INC.,
AND SKYWORKS FILTER
SOLUTIONS JAPAN CO. LTD
NOTICE OF MOTION AND

MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

**DECLARATION OF KEIJI JONO IN SUPPORT OF DEFENDANT
SKYWORKS FILTER SOLUTIONS JAPAN CO. LTD'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT UNDER FED. R. CIV. P. 12(b)(2)**

I, Keiji Jono, hereby declare the following:

1. I am over the age of 18, am employed by Skyworks Filter Solutions Japan Co. Ltd ("Skyworks Japan") as the VP of Operations, and provide this declaration in support of Skyworks Japan's Motion to Dismiss Plaintiff's Complaint Under Fed. R. Civ. P. 12(b)(2).¹ The statements in this declaration are based upon my personal knowledge, my review of Skyworks Japan corporate records maintained in the ordinary course of business, or information provided to me in my role as VP of Operations.

¹ I understand that Skyworks Japan appears for the limited purpose of contesting jurisdiction and service.

1 2. Skyworks Japan is a Japanese corporation incorporated under the laws
2 of Japan, and is headquartered at 2-1501-Chrome, Hirabayashikita, Suminoe-ku,
3 Osaka, Japan. In my role as VP of Operations, I work at Skyworks Japan's
4 headquarters.

5 3. Skyworks Japan was formed in 2014 as a result of a joint venture
6 between Skyworks Solutions Inc. and Panasonic Corporation for the purpose of
7 researching, developing, and manufacturing high-performance filters used in
8 wireless communication devices. Through Panasonic's contribution, Skyworks
9 Japan can trace its roots back to the early days of research and development into
10 piezoelectric materials in the 1940s.

11 4. Today, Skyworks Japan is an operating company with more than 1,400
12 scientists, researchers, engineers, contractors, and other personnel, all of whom live
13 in Japan and work at one of its three Japanese locations: (1) the Osaka headquarters
14 location identified above, (2) a research and development facility located at Maruito
15 OBP Bldg. 10F, 2-2-22 Shiromi, Chuo-ku, Osaka, Japan, and (3) its corporate offices
16 located at Tokyo Front Terrace Bldg. 13F, 2-3-14, Higashi-Shinagawa, Shinagawa-
17 ku, Tokyo, Japan. Skyworks Japan has no other locations and maintains no other
18 facilities.

19 5. In particular, although it is a subsidiary of Skyworks Solutions Inc.,
20 Skyworks Japan does not own or lease real estate anywhere in California, nor
21 anywhere else in the United States. Nor does it have any employees in California.
22 Rather, Skyworks Japan's business is conducted wholly outside of the United
23 States.

24 6. For example, Skyworks Japan researches, develops, and manufactures
25 components for high-performance radio frequency filters, including components for
26 BAW filters, entirely in Japan. As relevant here, Skyworks Japan manufactures the
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1 front-end silicon wafers that contain microscopic resonator components ultimately
2 used in BAW filters entirely in Japan.

3 7. Skyworks Japan does not sell any products in California or ship any
4 products to California. Instead, Skyworks Japan sells all of its front-end silicon
5 wafers to Skyworks Global Pte. Ltd. in Ang Mo Kio, Singapore (“Skyworks
6 Singapore”). Upon sale to Skyworks Singapore, Skyworks Japan has no further
7 involvement in the supply chain of either BAW filter chips or front-end modules that
8 incorporate such chips.

9 8. Skyworks Japan is a separate company from Skyworks Solutions, Inc.,
10 Skyworks Singapore, and Skyworks Solutions de México, S. de R.L. de C.V.
11 (“Skyworks Mexico”), and Skyworks Japan maintains its own corporate formalities.
12 For example, Skyworks Japan maintains separate books and records, and separate
13 assets from each of Skyworks Solutions Inc, Skyworks Singapore, and Skyworks
14 Mexico. It likewise maintains capital reserves separate from each of Skyworks
15 Solutions, Inc., Skyworks Singapore, and Skyworks Mexico. Skyworks Japan pays
16 its own employees and expenses, and it maintains separate control over its
17 employees and daily operations, separate from each of Skyworks Solutions, Inc.,
18 Skyworks Singapore, and Skyworks Mexico.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Executed in Osaka, Japan this 8th day of December 2025.

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7 Keiji Jono
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